

1 JASON M. FRIERSON
2 United States Attorney
3 District of Nevada
4 Nevada Bar Number 7709
5 DANIEL J. COWHIG
6 Assistant United States Attorney
7 United States Attorney's Office
8 501 Las Vegas Boulevard South, Suite 1100
9 Las Vegas, Nevada 89101-6514
10 (702) 388-6336
11 daniel.cowhig@usdoj.gov
12 *Attorneys for the United States of America*

13
14 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

15 UNITED STATES OF AMERICA,

16 Plaintiff,

17 vs.

18 JOSEPH GIULIANO,

19 Defendant.

20 Case No. 2:14-cr-371-JCM-DJA

21 NINETEENTH STIPULATION TO
22 CONTINUE SENTENCING

23 The United States of America, through Jason M. Frierson, United States Attorney, and
24 Daniel J. Cowhig, Assistant United States Attorney, and the defendant Joseph Giuliano, by
and through his counsel, Shawn R. Perez, Esq., stipulate and agree and jointly move this
Honorable Court to vacate the sentencing hearing set for Wednesday, February 8, 2023, at
10:00 a.m. and reset the sentencing proceedings in this matter at a date on or after May 1, 2023.

25 The parties make this stipulation and motion for good cause and not for the purposes of
delay.

26 The possibility remains that defendant Giuliano may be called to testify in proceedings
in a related case or assist in other matters pursuant to his plea agreement. The parties agree that

1 it is in the interest of justice to defer sentencing. Defendant Giuliano believes it is in his best
2 interest to do so. The parties request this continuance of approximately 90 days to
3 accommodate currently scheduled proceedings in another matter in which defendant Giuliano
4 might be called upon to serve as a witness and any filings in this matter that may result.

5 Defendant Giuliano is not in custody and agrees to this continuance.

6 Denial of this request for continuance could result in a miscarriage of justice.

7 This is the nineteenth request to continue sentencing in this matter.

8 The parties respectfully request this Honorable Court issue the attached proposed Order
9 to accomplish these ends.

10 Dated February 3, 2023

11 Counsel for Defendant
12 JOSEPH GIULIANO

JASON M. FRIERSON
United States Attorney

13 //s// *Shawn R. Perez*
14 SHAWN R. PEREZ, ESQ.
Law Offices of Shawn R. Perez
7121 W Craig RD #113-38
15 Las Vegas, NV 89129
702-485-3977
16 shawn711@msn.com

//s// *Daniel J Cowhig*
DANIEL J. COWHIG
Assistant United States Attorney

1
2
3
4 **UNITED STATES DISTRICT COURT**
5 **DISTRICT OF NEVADA**
6

6 UNITED STATES OF AMERICA,
7

7 Plaintiff,
8

8 vs.
9

9 JOSEPH GIULIANO,
10

10 Defendant.

Case No. 2:14-cr-371-JCM-DJA

11
12 **ORDER**
13

13 **FINDINGS OF FACT AND CONCLUSIONS OF LAW**

14 Based on the stipulation of the parties and the record in these matters, the Court finds that the
15 parties make this stipulation and motion for good cause and not for the purposes of delay. The
16 possibility remains that defendant Giuliano may be called to testify in proceedings in a related
17 case or assist in other matters pursuant to his plea agreement. The parties agree that it is in the
18 interest of justice to defer sentencing. Defendant Giuliano believes it is in his best interest to do
19 so. The parties request this continuance of approximately 90 days to accommodate currently
20 scheduled proceedings in another matter in which defendant Giuliano might be called upon to
21 serve as a witness and any filings in this matter that may result. The parties agree that it is in the
22 interest of justice to defer sentencing. Defendant Giuliano believes it is in his best interest to do
23 so.

24 Defendant Giuliano is not in custody and agrees to this continuance.

1 Denial of this request for continuance could result in a miscarriage of justice.

2 This is the nineteenth request to continue sentencing in this matter.

3 **ORDER**

4 **IT IS HEREBY ORDERED**, on the stipulation of the parties and good cause appearing
5 therefor, that the sentencing hearing set for Wednesday, February 8, 2023, at 10:00 a.m. be
6 vacated and reset for **May 5, 2023, at 10:00 a.m.** in Las Vegas Courtroom 6A.

7 DATED February 6, 2023.

8
9 *James C. Mahan*
10

THE HONORABLE JAMES C. MAHAN
UNITED STATES DISTRICT JUDGE
11
12
13
14
15
16
17
18
19
20
21
22
23
24